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May 2, 2022

VIA ECF

Judge Pamela K. Chen
Courtroom: 4F
Chambers: N 631
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Carlos Collazos v. Garda CL Atlantic, Inc 21-cv-02095-PKC-JRC*

Dear Judge Chen:

The Parties hereby submit this letter in compliance with your Honor's April 11 and April 25 Orders, requesting that the parties file a joint letter with a proposed revised briefing schedule for Defendant's motion to compel arbitration, in light of enumerated assertions by the United Federation of Special Police and Security Officers, and the Special and Superior Officers Benevolent Association (collectively, the "Unions").

The Parties request the following briefing schedule: (1) Defendant's revised motion to compel is due on or before May 18, 2022; (2) Plaintiff's opposition is due on or before June 1, 2022; and (3) Defendants' reply, if any, is due on or before June 10, 2022.

In accordance with the practice outlined by the Court in its November 10, 2021 Order, the parties will not file their motion papers until the motion has been fully briefed. The motion and all supporting papers will be served on the other party along with a cover letter setting forth whom the movant represents and the papers being served. Only a copy of the cover letter will be filed on the docket, as a letter, not as motion. On the day the motion is fully briefed, each party will electronically file its own moving papers.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Loren L. Forrest, Jr.
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